LAW OFFICE OF RAYMOND CHANDLER 1 Raymond Chandler (SBN 217827) 15 W. Carrillo Street, Suite 220 2 Santa Barbara, CA 93101 3 Telephone (805) 965-1999 Facsimile (805) 962-0722 Email: rdc@rdclawoffice.com 5 Attorney for creditors Jiame Calderon 6 and the three minor children of Jiame Calderon and Anna Calderon (deceased) 7 8 IN THE UNITED STATES BANKRUPTCY COURT 9 EASTERN DISTRICT OF CALIFORNIA 10 FRESNO DIVISION 11 In the Matter of: Case No.: 17-13797-9 12 TULARE REGIONAL HEALTHCARE 13 DC No.: RDC-1 DISTRICT 14 Chapter 9 Debtor. 15 Date: November 1, 2017 16 Time: 9:30 a.m. Place: 2500 Tulare Street 17 Fresno, CA 93721 Dep't. B, Courtroom 13, 5th Fl. 18 Judge: Hon. Rene Lastreto II 19 (Declaration of Raymond Chandler with 20 supporting exhibits filed concurrently) 21 22 NOTICE OF MOTION OF JIAME CALDERON AND THE THREE MINOR CHILDREN OF JIAME CALDERON AND ANA CALDERON (DECEASED) FOR 23 RELIEF FROM AUTOMATIC STAY UNDER 11 USC § 362 24 1. NOTICE IS HEREBY GIVEN to the Debtor and Trustee ("Responding Parties"), and 25 any other interested parties, that on the above date and time and in the indicated courtroom, 26 Jiame Calderon and the three minor children of Jiame Calderon and Ana Calderon (deceased) 27 ("Movants") will move this Court for an Order granting relief from the automatic stay and 28

waiving the 14 hold on the grounds set forth in the attached Motion.

2. Hearing Location is: Judge René Lastreto II

Department B, Room 13, 5th Fl. U.S. Bankruptcy Court (E.D.Cal.) 2500 Tulare Street Suite 2501

Fresno, CA 93721

- 3. This Motion and supporting papers are being served on the interested parties pursuant to Sections 362 and 901.
- 4. Under LBR-9014 interested parties are not required to file written oppositions. Oppositions, if any, shall be presented at the hearing.
- 5. Interested parties can determine if the matter has been resolved without oral argument or if the Court has issued a tentative ruling, and can view pre-hearing dispositions on the Court's website at www.caeb.uscourts.gove after 4:00 p.m. on the day before the hearing. Parties appearing telephonically must view the pre-hearing disposition prior to the hearing.

DATED: October 2017

Respectfully submitted,

LAW OFFICE OF RAYMOND CHANDLER

Raymond Chandler, Attorney for creditors Jiame Calderon and the three minor children of Jiame

Calderon and Anna Calderon (deceased)